The Honorable James L. Robart 1 2 3 4 5 UNITED STATES DISTRICT COURT 6 FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE 7 8 MICROSOFT CORPORATION, a Washington corporation, CASE NO. C10-1823-JLR 9 Plaintiff, MOTOROLA MOBILITY'S AND 10 GENERAL INSTRUMENT'S REPLY TO MOTOROLA MOBILITY'S AND 11 v. GENERAL INSTRUMENT'S MOTION TO FILE DOCUMENTS UNDER SEAL 12 MOTOROLA, INC., and MOTOROLA IN SUPPORT OF MOTOROLA MOBILITY LLC, and GENERAL MOBILITY'S AND GENERAL 13 INSTRUMENT CORPORATION. INSTRUMENT'S REPLY TO MOTOROLA'S DAUBERT MOTION 14 Defendants. NOTED ON MOTION CALENDAR: 15 Friday, September 21, 2012 16 MOTOROLA MOBILITY LLC, and GENERAL INSTRUMENT CORPORATION. 17 Plaintiffs/Counterclaim Defendant, 18 19 v. 20 MICROSOFT CORPORATION, 21 Defendant/Counterclaim Plaintiff. 22 23 24 25 26

MOTOROLA REPLY TO MOTOROLA MOTION TO FILE DOCUMENTS UNDER SEAL IN SUPPORT OF MOTOROLA REPLY TO MOTOROLA'S DAUBERT MOTION CASE NO. C10-1823-JLR

315 Fifth Avenue South, Suite 1000 Seattle, Washington 98104-2682 Telephone: (206) 676-7000 Fax: (206) 676-7001

1	Because Motorola meets the standards for sealing as discussed in the moving brief (Dkt.
2	No. 426), and because Microsoft (see Dkt. No. 441) does not oppose Motorola's Motion to File
3	Documents Under Seal In Support of Motorola Mobility's and General Instrument's Reply to
4	Motorola's <i>Daubert</i> Motion (" <i>Daubert</i> Reply"), and offers additional support why Motorola's
5	Daubert Reply should be sealed, Motorola respectfully requests that the Court grant the Motion,
6	and seal the unredacted version of Motorola's <i>Daubert</i> Reply (Dkt. No. 428).
7	DATED this 21st day of September, 2012.
8	SUMMIT LAW GROUP PLLC
9	By /s/ Ralph H. Palumbo
	Ralph H. Palumbo, WSBA #04751
10	Philip S. McCune, WSBA #21081 Lynn M. Engel, WSBA #21934
11	ralphp@summitlaw.com
	philm@summitlaw.com
12	lynne@summitlaw.com
13	By /s/ Thomas V. Miller
14	Thomas V. Miller
14	MOTOROLA MOBILITY LLC
15	600 North U.S. Highway 45
	Libertyville, IL 60048-1286
16	(847) 523-2162
17	And by
18	Jesse J. Jenner (pro hac vice)
19	Steven Pepe (<i>pro hac vice</i>) Kevin J. Post (<i>pro hac vice</i>)
1)	Ropes & Gray LLP
20	1211 Avenue of the Americas New York, NY 10036-8704
21	(212) 596-9046
22	jesse.jenner@ropesgray.com steven.pepe@ropesgray.com
22	kevin.post@ropesgray.com
23	
24	
25	
26	

MOTOROLA REPLY TO MOTOROLA MOTION TO FILE DOCUMENTS UNDER SEAL IN SUPPORT OF MOTOROLA REPLY TO MOTOROLA'S DAUBERT MOTION - 1 CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC

315 FIFTH AVENUE SOUTH, SUITE 1000 SEATTLE, WASHINGTON 98104-2682 Telephone: (206) 676-7000

Fax: (206) 676-7001

1	James R. Batchelder (pro hac vice)
2	Norman H. Beamer (<i>pro hac vice</i>) Ropes & Gray LLP
3	1900 University Avenue, 6 th Floor East Palo Alto, CA 94303-2284
4	(650) 617-4030 james.batchelder@ropesgray.com
5	norman.beamer@ropesgray.com
6	Paul M. Schoenhard (<i>pro hac vice</i> Ropes & Gray LLP
	One Metro Center 700 12 th Street NW, Suite 900
7	Washington, DC 20005-3948
8	(202) 508-4693 paul.schoenhard.@ropesgray.com
9	Attorneys for Motorola Solutions, Inc., Motorola
10	Mobility LLC and General Instrument Corp.
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	

MOTOROLA REPLY TO MOTOROLA MOTION TO FILE DOCUMENTS UNDER SEAL IN SUPPORT OF MOTOROLA REPLY TO MOTOROLA'S DAUBERT MOTION - 2 CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC

315 FIFTH AVENUE SOUTH, SUITE 1000 SEATTLE, WASHINGTON 98104-2682 Telephone: (206) 676-7000 Fax: (206) 676-7001

CERTIFICATE OF SERVICE

1 ||

2

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

3

4

5

7

8

9

11

12

13

14

15

16

17

18 19

20

21

22

23

2425

26

Arthur W. Harrigan, Jr., Esq.
Christopher T. Wion, Esq.
Shane P. Cramer, Esq.
Calfo Danielson, Harrigan, Leyh & Eakes LLP
arthurh@calfoharrigan.com
chrisw@calfoharrigan.com
shanec@calfoharrigan.com
Richard A. Cederoth, Esq.

Brian R. Nester, Esq. David T. Pritikin, Esq. Douglas I. Lewis, Esq. John W. McBride, Esq. David Greenfield, Esq. William H. Baumgartner, Jr., Esq. David C. Giardina, Esq. Carter G. Phillips, Esq. Constantine L. Trela, Jr., Esq. Ellen S. Robbins, Esq. Nathaniel C. Love, Esq. Sidley Austin LLP rcederoth@sidley.com bnester@sidley.com dpritikin@sidley.com dilewis@sidley.com jwmcbride@sidley.com david.greenfield@sidley.com wbaumgartner@sidley.com dgiardina@sidley.com cphillips@sidley.com ctrela@sidley.com erobbins@sidlev.com

T. Andrew Culbert, Esq. David E. Killough, Esq. Microsoft Corp. andycu@microsoft.com davkill@microsoft.com

nlove@sidley.com

DATED this 21st day of September, 2012.

/s/ *Marcia A. Ripley* Marcia A. Ripley

MOTOROLA REPLY TO MOTOROLA MOTION TO FILE DOCUMENTS UNDER SEAL IN SUPPORT OF MOTOROLA REPLY TO MOTOROLA'S DAUBERT MOTION - 3 CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC

315 FIFTH AVENUE SOUTH, SUITE 1000 SEATTLE, WASHINGTON 98104-2682 Telephone: (206) 676-7000 Fax: (206) 676-7001